

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ENTRAL GROUP INTERNATIONAL, LLC,

Plaintiff,

Case No.: 1-05-cv-02292-CBA-SMG

v.

LEGEND CAFÉ & KARAOKE, INC, WA MEN  
ZHANG, and WEI HAO LI

**DECLARATION OF ROBERT E.  
HANLON**

Defendants.

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Robert E. Hanlon makes the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a member of the bar of this Court and a partner of Alston & Bird LLP. I submit this declaration pursuant to Local Civil Rule 1.4 in support of the application of Entral Group International, LLC ("EGI"), plaintiff in the above-captioned case, to substitute Alston & Bird LLP as their attorneys of record in place of Coudert Brothers LLP, their existing attorneys of record. Filed herewith is an stipulation and proposed order allowing the foregoing substitution.

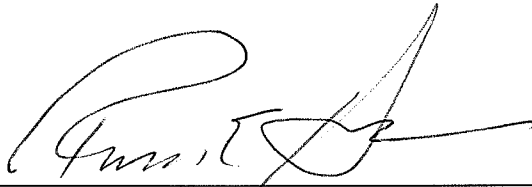
2. This application is made on the ground that EGI desires to make a change in their attorneys of record, to which Coudert Brothers LLP has no objection.

3. The current posture of the case is as follows: Plaintiff filed a summons and complaint in this action on May 11, 2005. The summons and complaint were duly served on defendants Legend Café & Karaoke, Inc., Wa Men Zhang and Wei Hao Li (collectively "Defendants") on June 4, 2005. Defendants have failed to plead or otherwise defend in this action. As such, on October 7, 2005, Plaintiff moved for a default judgment against Defendants. On October 14, 2005, the Honorable Carol B. Amon ruled that a default judgment be entered

against Defendants and referred Plaintiff's request for damages to the Honorable Steven M. Gold for a report and recommendation on what relief should be awarded. On October 17, 2005, Judge Gold ordered that Plaintiff make submissions in support of its damages no later than November 7, 2005.

4. In light of Defendants failure to appear, the requested substitution will result in no prejudice to any party and should result in no delay.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 1, 2005.

A handwritten signature in black ink, appearing to read 'Robert E. Hanlon', written over a horizontal line.

Robert E. Hanlon (RH-8794)